IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

GEORGE HART,	
) No. 08 C 0761
Plaintiff,)
) JUDGE ST. EVE
V.)
) Magistrate Judge Brown
OFFICER RUSSELL E. WHITE, JR., #13770,)
OFFICER JESUS CANO #13648,)
OFFICER JEFFREY J. ZWIT, #10336, OFFICER)
LUIS VEGA, #13853, and the CITY OF)
CHICAGO,)
Defendants.)

AGREED MOTION FOR ENTRY OF STIPULATION

Defendant City of Chicago, by its attorney Mara S. Georges, Corporation Counsel, with the agreement of Plaintiff, in response to its motion to structure discovery, asks this Court to enter of the attached stipulation. In support thereof, the City states:

- 1. On April 7, 2008, the City filed a motion to structure discovery, particularly any discovery directed at the City and Plaintiff's Monell claim against it, in the underlying case. On April 23, 2008, Plaintiff asked for an extension of time in order to reach an agreement regarding the issues raised in the City's motion.
- 2. Since that time, the parties have been actively working to reach an agreement regarding discovery in this matter.
- 3. Attached is the stipulation the parties have agreed to regarding Plaintiff's Monell claim against the City of Chicago.
 - 4. The parties pray that the Court enter the attached stipulation.

WHEREFORE, the City, with the agreement of Plaintiff, requests that this Court enter the attached Agreed Stipulation.

Respectfully submitted,

MARA S. GEORGES Corporation Counsel of the City of Chicago

By: /s/ Megan K. McGrath
Megan K. McGrath
Assistant Corporation Counsel

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